



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 11, 2000

MEMORANDUM

SUBJECT: Response to National Remedy Review Board Recommendations
for the Aerojet Superfund Site, Western Groundwater Operable Unit (OU-3)

FROM: Keith Takata, Director
For Superfund Division, EPA Region 9

TO: Bruce Means, Chair
National Remedy Review Board
Office of Solid Waste and Emergency Response

Purpose

This provides Region 9's response to the advisory recommendations of the National Remedy Review Board (NRRB) regarding the proposed remedial action for the Aerojet Superfund Site, Western Groundwater Operable Unit (OU-3). Those recommendations were provided in your memorandum to me dated October 4, 2000.

Response to NRRB Advisory Recommendations

- Comment #1: The board recommends that the region clearly document in the ROD how the California State Water Resources Control Board Resolution Number 92-49 will affect contaminant-specific restoration levels, especially for VOCs and perchlorate. The board questions why aquifer restoration levels for VOCs are established below maximum contaminant levels (MCLs). Based on the presentation to the board, these lower-than-MCL VOC levels are being set pursuant to CA 92-49 (considered by the region to be an ARAR for this site) because they are expected to be achieved as a result of the groundwater extraction necessary to meet the perchlorate cleanup level (4 ppb). However, as in situ perchlorate technologies develop, and as toxicological studies on perchlorate are completed, the region may revise the remedy for perchlorate (e.g. extraction strategy, restoration level). If this were to occur, it will be important to understand how these changes might affect the original rationale for VOC restoration levels. Therefore, it is important that the ROD clearly document the bases for VOC restoration levels and their link to the perchlorate remedy. Further, the board recommends that the region re-evaluate the cleanup levels for the VOCs (to the extent

they fall below MCLs), should the approach to perchlorate remediation change.

Response: Region 9's OU3 ROD will clearly document the bases for VOC restoration levels and their link to the perchlorate remedy. Should the approach to perchlorate remediation change, Region 9 will re-evaluate the cleanup levels for VOCs to the extent they fall below MCLs.

- Comment #2: The board notes that the OU3 remedy depends upon containing the up-gradient contamination sources. Any delays in establishing an operational and functional containment system will only increase an already lengthy restoration time frame. The board encourages the region to expedite the cleanup efforts in these source areas.

Response: Region 9 agrees that addressing contaminant sources upgradient of OU3 is a high priority. Region 9 will attempt to expedite cleanup actions in these source areas.

- Comment #3: Given the number of drinking water wells close to the migrating plume, it is likely that some wells will become contaminated before the lengthy remedial action is complete. Since options for providing alternate water supplies in this area are few, the ROD should consider this issue directly and provide a contingency for an alternate water supply to quickly replace affected drinking water wells.

Response: Region 9's OU3 ROD will address providing alternative water supplies for the area impacted by OU3.

- Comment #4: The board supports the aggressive cleanup approach in alternative 4C and believes the region should consider the PRP's concern of downward contaminant migration during the design and implementation of the alternative.

Response: The PRP's concerns for downward contaminant migration will be reviewed as part of the design and implementation of alternative 4C if this alternative is selected after the proposed plan public comment period.

We appreciate this opportunity to respond to the NRRB's recommendations and would be happy to answer any questions.

cc: Rafael Gonzalez, Region 1/9 Center Director